

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF ILLINOIS

SLADE SELSOR,

PLAINTIFF,

vs.

INGRAM BARGE COMPANY, and
UNITED MARITIME GROUP, L.L.C.

DEFENDANT.

Case No. 3:13-CV-00379

COMPLAINT

NOW COMES the Plaintiff, Slade Selsor, by and through his attorney,
Matthew B. Ferrell of Johnson & Schneider, L.L.C., and for his complaint against
the Defendants, Ingram Barge Company and United Maritime Group, L.L.C.,
states as follows:

JURISDICTION AND VENUE

1. That this court has jurisdiction over this matter as it arises under general admiralty and maritime law in which this court has original jurisdiction.
2. That venue is proper in the Southern District of Illinois as the events giving rise to the claim as well as the injury sustained in this case occurred on the Mississippi River near Cairo, Illinois.

PARTIES

3. That Plaintiff, Slade Selsor, is a resident of Jackson, Missouri and was employed by United Barge Line, L.L.C. at the time of his injury.

4. That Defendant, United Barge Line was a wholly owned subsidiary of Defendant, United Maritime Group, L.L.C., at the time of Plaintiff's injury.

5. That on information and belief United Barge Line has since been purchased by Defendant, Ingram Barge Company .

GENERAL ALLEGATIONS

6. That on or about May 7, 2010, the Plaintiff was employed by United Barge Line and was working on a ship owned by United Barge Line and at its direction.

7. That as Plaintiff was working on the vessel, a piece of nylon rope which was approximately four inches thick unexpectedly snapped, flew back and struck Plaintiff in the face.

8. That the rope caused severe injury to Plaintiff's face, nose, mouth, jaw and teeth.

9. That as a direct and proximate result of the foregoing, Plaintiff suffered severe injuries to his person as well as pain, suffering, disability and loss of quality of life, while incurring medical expenses past, present and future.

COUNT I - CLAIM OF UNSEAWORTHINESS

10. That at the time Plaintiff was injured he was employed on a vessel owned by United Barge Line and was contributing to the vessel's mission and maintenance while it was in navigation or otherwise anchored preparing for future trips.

11. That at the time of Plaintiff's injury United Barge Line and the Defendants had a duty to provide a seaworthy ship by maintaining the ship's equipment and insuring it was reasonably fit for its intended use.

12. That the nylon rope which unexpectedly snapped and struck Plaintiff in the face was being used in its proper form and in accordance with its anticipated use at the time of its failure.

13. That therefore, Defendants breached their duty of providing a seaworthy vessel as the rope was not reasonably fit for its intended use.

14. That the unseaworthy condition, namely the defective rope, proximately caused Plaintiff's injuries.

WHEREFORE, Plaintiff, Slade Selsor, prays this Honorable Court for judgment against Defendants United Maritime Group, L.L.C. and United Barge Line, L.L.C., in an amount that is fair and reasonable under the circumstances to compensate Plaintiff for his injuries and for such other and further relief as this Court deems just and proper .

PLAINTIFF DEMANDS A JURY TRIAL.

JOHNSON & SCHNEIDER, L.L.C.

/s/Matthew B. Ferrell
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